## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JORGE CERVANTES,	)	
	)	
Plaintiff,	)	Judge Lindberg
	)	Magistrate Judge Brown
<b>v.</b>	)	
	)	
CITY OF CHICAGO, and	)	08 C 529
<b>Unknown Chicago Police Officers</b>	)	
John Does 1-10,	)	
	)	
Defendants.	)	

## DEFENDANT CITY'S MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD

Defendant City of Chicago, by its attorney Mara S. Georges, Corporation Counsel of the City of Chicago, moves this Court for an extension of time to answer or otherwise plead. In support of this motion, Defendant states:

- 1. The undersigned counsel for Defendant City of Chicago were only recently assigned to this case. The City's answer other pleading was due on or about March 6, 2008.
- 2. In this complaint, Plaintiff sues the City and unknown individual defendant police officers. The City and Plaintiff's counsel are working cooperatively regarding the identification of the unknown police officers. On or about March 5, 2006, Plaintiff's counsel provided documents that may assist the City in identifying the unknown police officers.
- 3. The City will be working to identify the police officers, if any, as expeditiously as possible. Thereafter, Plaintiff will be filing an amended complaint to name the individual Defendants.

- 4. Accordingly, the City requests that it be given an extension of time to answer or otherwise plead until fourteen days after the filing of Plaintiff's amended complaint.
  - 5. This motion is not brought for any improper purpose or delay.

**WHEREFORE**, the City respectfully requests that this Court grant it an extension of time to answer or otherwise plead until fourteen days after Plaintiff files his amended complaint.

**DATED: MARCH 5, 2008** 

Respectfully submitted,

MARA S. GEORGES Corporation Counsel

By: /s/ Diane S. Cohen

Diane S. Cohen Joan P. Altman

**Assistants Corporation Counsel** 

30 N. La Salle, Ste. 1020 Chicago, Illinois 60602 (312) 744-2836/744-2826

<b>CERTIFICAT</b>	'E OF	SERV	<b>ICE</b>
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\_\_\_\_\_I, Diane Cohen, an attorney, hereby certify that pursuant to Local Rule 5.9, in accordance with the U.S. District Court for the Northern District of Illinois, Eastern Division's General Order of Electronic Case Filing, Defendant's Motion for Extension of Time, this March 5, 2008, to:

Louis J. Meyer
Daniel P. Kiss
Lawrence V. Jackowiak
Law Offices of Lawrence V. Jackowiak
20 North Clark Street, Suite 1700
Chicago, Illinois 60602

By: <u>/s/Diane Cohen</u>
DIANE COHEN